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5 Attorneys for all Defendants except Prasad Lakireddy

6

7

8 IN THE UNITED STATES DISTRICT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 JANE DOE I; et al.,

11 Plaintiffs,

12 vs.

13 LAKIREDDY BALI REDDY, et al.,

14 Defendants.

15 Case No. C-02-5570-WHA

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SUPPLEMENTAL RESPONSES TO  
PLAINTIFF JANE DOE  
INTERROGATORIES TO DEFENDANT  
LAKIREDDY BALI REDDY

AMENDED

PROPOUNDING PARTY: PLAINTIFF JANE DOE I

RESPONDING PARTY: LAKIREDDY BALI REDDY

SET NUMBER: ONE

13. For each of the PLAINTIFFS, IDENTIFY every person and ENTITY that EMPLOYED the PLAINTIFF to perform work in California at any time prior to January 1, 2000 and provide the dates of EMPLOYMENT.

RESPONSE:

1. DOE I often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant. Defendants don't know anyone else that employed this plaintiff.
2. DOE II often socialized at restaurant Pasand Madras Cuisine, but never was

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1                   employed by any defendant. Defendants don't know anyone else that employed  
 2                   this plaintiff.

3.                  Doe III worked for various restaurants owned by Defendants on an "as needed  
 4                  basis" and was employed by Jay Construction from 1995 until the end of 1999 as  
 5                  well n an "as needed basis". Defendants can not be more specific with regard to  
 6                  the hours Doe III worked. Defendants did pay for several trips to India for Doe III  
 7                  for months. During the vacations to India Doe III performed no work for  
 8                  Defendants. Defendants don't know anyone else that employed this plaintiff.

9.                  Doe IV worked for Jay Construction from 1995 until 1999. Doe IV was paid by  
 10                 Active Tech Solutions but never performed any actual work for Active Tech  
 11                 Solutions. Defendants have searched records and are unable to determine the  
 12                 hours this plaintiff worked per week. Defendants paid for Doe IV to take trips  
 13                 back to India for several months at a time. Defendants believe Doe IV worked at  
 14                 Subway Sandwiches in Berkeley. Defendants have made a diligent search, but are  
 15                 unable to give more specific information. Defendants don't know anyone else that  
 16                 employed this plaintiff.

17.                 Doe V worked for Jay Construction from 1995 until 1999. Defendants paid for  
 18                 Doe V to take trips back to India for several months at a time. Defendants have  
 19                 searched records and are unable to determine the hours the plaintiff worked per  
 20                 week. Defendants don't know anyone else that employed this plaintiff.

21.                 Doe VI worked for Jay Construction from 1995 until 1999. Defendants paid for  
 22                 Doe VI to take trips back to India for several months at a time. Defendants have  
 23                 made a diligent search of the records but are unable to give specific information on  
 24                 the hours this plaintiff worked. Defendants don't know anyone else that employed  
 25                 this plaintiff.

26.                 Doe VII was never employed by a Defendant. Defendants don't know anyone  
 27                 else that employed this plaintiff.

28.                 Doe VIII worked for Pasand Madras Cuisine from September of 1999 until

January of 2000. Defendants can not be more specific concerning the hours she worked. Defendants are not aware of Doe VIII's other employers.

9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to work for Active Tech Solutions but never worked for Active Tech Solutions. Defendants don't know anyone else that employed this plaintiff.

10. CHANTIYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant. Defendants don't know anyone else that employed this plaintiff.

19. In YOUR PLEA AGREEMENT, YOU admit that "[b]etween 1986 and January 2000, [YOU] agreed with [YOUR] codefendants and others to bring Indian nationals into the United States on the basis of fraudulent visas." IDENTIFY all the "Indian Nationals" whom you "agreed with [YOUR] codefendants and others to bring . . . into the United States on the basis of fraudulent visas."

**RESPONSE:** I have responded to discovery based on the advice of my criminal counsel to assert my Fifth Amendment privilege against self-incrimination where necessary. I have been informed that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-incrimination and that I must respond to discovery. I also understand that under Federal Rule of Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that could cause me and my family great economic harm. Although I respectfully disagree with the Court's Order I am providing the following answer because I fear this Court's sanctions. I am making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do not waive my rights to judicially challenge this Court's Order.

I assisted the following individuals; Doe I, Doe II, Doe III, Doe IV, Doe V, Doe VI, Doe VIII, Jhansi Vemireddy, Ambika Velvadapu, Koteswara Gurrala, Koteswari Patakottu, Sriram Reddy Kudumula, Kota Reddy Kudumula, Somulu Garlapati, Ramulamma Chattu, Gopal Yerragunta, Kittemma Yerragunta, Sudha Mallu, Krishna Reddy Mallu, Shaik Ali Khan, Shaik Kudan Saheb, Shaik Meera Vali and Shaik Subhani.

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1       20. In YOUR PLEA AGREEMENT, YOU admit that "[b]etween 1986 and January 2000,  
 2 [YOU] agreed with [YOUR] codefendants and others to bring Indian nationals into the United  
 3 States on the basis of fraudulent visas." IDENTIFY all the "codefendants and others" with whom  
 4 you "agreed. . . to bring Indian Nationals into the United States on the basis of fraudulent visas."  
 5 RESPONSE: I have responded to discovery based on the advice of my criminal counsel to assert  
 6 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed  
 7 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-  
 8 incrimination and that I must respond to discovery. I also understand that under Federal Rule of  
 9 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that  
 10 could cause me and my family great economic harm. Although I respectfully disagree with the  
 11 Court's Order I am providing the following answer because I fear this Court's sanctions. I am  
 12 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do  
 13 not waive my rights to judicially challenge this Court's Order.

14  
 15 The only individuals I agreed to assist in coming to the United States with fraudulent immigration  
 16 Are listed in response to interrogatory 19.

17  
 18 21. In YOUR PLEA AGREEMENT, YOU admit that YOU "arranged and directed others to  
 19 make arrangements to encourage aliens to sign and submit false visa petitions, to obtain  
 20 fraudulent Indian passports, and to enter the United States under false identities." IDENTIFY all  
 21 the "aliens" whom YOU "arranged and directed others to make arrangements to encourage... to  
 22 sign and submit false visa petitions, to obtain fraudulent Indian passports, and to enter the United  
 23 States under false identities."

24  
 25 RESPONSE: I have responded to discovery based on the advice of my criminal counsel to assert  
 26 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed  
 27 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-  
 28 incrimination and that I must respond to discovery. I also understand that under Federal Rule of

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1 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that  
 2 could cause me and my family great economic harm. Although I respectfully disagree with the  
 3 Court's Order I am providing the following answer because I fear this Court's sanctions. I am  
 4 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do  
 5 not waive my rights to judicially challenge this Court's Order.

6 The only individuals I agreed to assist in coming to the United States with fraudulent immigration  
 7 Are listed in response to interrogatory 19.

8 22. In YOUR PLEA AGREEMENT, YOU admit to engaging in a conspiracy to bring Indian  
 9 nationals into the United States on the basis of fraudulent visas. IDENTIFY all the other  
 10 participants in this conspiracy.

11 RESPONSE: I have responded to discovery based on the advice of my criminal counsel to assert  
 12 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed  
 13 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-  
 14 incrimination and that I must respond to discovery. I also understand that under Federal Rule of  
 15 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that  
 16 could cause me and my family great economic harm. Although I respectfully disagree with the  
 17 Court's Order I am providing the following answer because I fear this Court's sanctions. I am  
 18 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do  
 19 not waive my rights to judicially challenge this Court's Order.

20 I assisted the following individuals; Doe I, Doe II, Doe III, Doe IV, Doe V, Doe VI, Doe VIII,  
 21 Jhansi Vemireddy, Ambika Velvadapu, Koteswara Gurrala, Koteswari Patakottu, Sriram Reddy  
 22 Kudumula, Kota Reddy Kudumula, Somulu Garlapati, Ramulamma Chattu, Gopal Yerragunta,  
 23 Kittemma Yerragunta, Sudha Mallu, Krishna Reddy Mallu, Shaik Ali Khan, Shaik Kudan Saheb,  
 24 Shaik Meera Vali and Shaik Subhani.

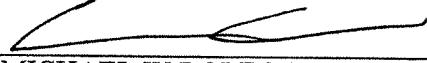
25 23. In YOUR PLEA AGREEMENT, YOU admit to engaging in a conspiracy to  
 26 bring Indian nationals into the United States on the basis of fraudulent visas. IDENTIFY all the  
 27 Indian nationals who were brought into the United States pursuant to this conspiracy.

1       **RESPONSE:** I have responded to discovery based on the advice of my criminal counsel to assert  
 2 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed  
 3 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-  
 4 incrimination and that I must respond to discovery. I also understand that under Federal Rule of  
 5 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that  
 6 could cause me and my family great economic harm. Although I respectfully disagree with the  
 7 Court's Order I am providing the following answer because I fear this Court's sanctions. I am  
 8 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do  
 9 not waive my rights to judicially challenge this Court's Order.

10      The only individuals I agreed to assist in coming to the United States with fraudulent immigration  
 11 Are listed in response to interrogatory 19.

12      Dated: 7-28-03

13      BISHOP, BARRY, HOWE, HANEY & RYDER

14      By: 

15      MICHAEL W BOLECHOWSKI  
 16      MARK C. RASKOFF  
 17      DAVID L. HART

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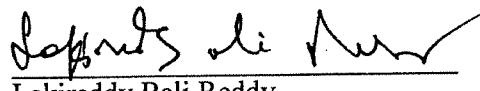
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1  
**VERIFICATION**  
2  
**RESPONSES TO PLAINTIFF'S DISCOVERY**

3 [ ] I, Lakireddy Bali Reddy am an owner of the Defendant and the foregoing answers are  
4 based upon my investigation into the facts concerning each specific request.  
5 [ ] I am an officer or agent of the party providing this Verification, and am authorized to  
6 make this Verification for and on its behalf, and I make this Verification for that reason; I  
7 have read the attached document(s) and know the contents; I am informed and believe and  
8 upon that ground allege that the matters stated in said document(s) are true.  
9 [ ] I am one of the general partners of the partnership providing this Verification, and am  
10 authorized to make this Verification for and on behalf of the partnership, and I make this  
11 Verification for that reason; I have read the attached document(s) and know the contents; I  
12 am informed and believe and upon that ground allege that the matters stated in said  
13 document(s) are true.  
14 [ ] I am one of the attorneys for the party required to provide this verified Answer; I make  
15 this Verification on behalf of said party who is absent from the County of Alameda,  
16 California, where I have my office; I have read the attached Answer and know its  
17 contents; I am informed and believe and on that ground allege that the matters stated in it  
18 are true.  
19 [ ] I am one of the attorneys for the party required to provide this verified response. I make  
20 this Verification for the reason checked below:  
21 [ ] because the facts alleged in the attached document are within my own  
22 personal knowledge, and are not within the knowledge of the responding  
23 party or any of its agents or employees;  
24 [ ] because the responding party's whereabouts are unknown to me, said party  
25 has failed to communicate with me concerning the subject litigation, and it  
26 is impossible, impractical or futile to secure said party's Verification to the  
27 attached document;

28 The matters stated in the attached document are true of my own knowledge, except as to  
any matters stated therein upon information and belief, and as to those matters I believe  
them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is  
true and correct and that this Verification was executed on JULY 19, 2003 at  
LOMPOC, California.

  
Lakireddy Bali Reddy